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† CERTIFIED BY THE SUPREME COURT
OF NJ AS A CIVIL TRIAL ATTORNEY

Tuesday, July 07, 2020

Via USPS Regular & Cert RRR
No. 70183090000104120545

Talat Mohamed
104 Corbin Ave
Apt. 1A
Jersey City, NJ, 07306

RE: Mohamed v. Bagolie et als.
HUD-L-1578-20

Dear Mr. Mohamed:

We are writing to put you on notice, pursuant to R. 1:4-8 ("the Frivolous Litigation Rule") and N.J.S.A. 2A:15-59.1- Frivolous Causes of Action ("the Frivolous Lawsuit Statute"), that your Complaint violates the provisions of the Court Rule and the Frivolous Litigation Statute.

Our firm worked hard on your case and succeeded in obtaining a determination of total disability after a trial. That entitles you to the maximum worker's compensation benefit afforded to you by law. While we agree with you, that you should receive more; your award is determined by your former wages as per New Jersey law neither our law office, the Worker's Compensation Judge or the Superior Court Judge can change that. As you are aware our office did attempt to have your lump sum payment accelerated in what is known as a 'commutation.' That request for 'commutation' was denied by the court. It pains us to take an adversarial position against a former client, but for the additional reasons outlined below your Complaint is frivolous and must be withdrawn.

Your lawsuit is improperly venued in Hudson County. If you are seeking to Appeal a determination of a Worker's Compensation Court that must be filed with the Appellate Division. Your lawsuit seeks relief which the Superior Court cannot grant. Specifically, you seek a review of settlements. Courts do not 'review' other courts' determinations unless there is a legally actionable claim. For this reason your request for an advisory opinion is manifestly inappropriate. Finally, you have requested the court "help to get a different lawyer" and conduct and "immediate investigation." Courts do not exist to provide legal assistance, nor do they investigate matters on your behalf.

In light of the foregoing, and among other things, your Complaint constitutes a clear violation of the Court Rule and the Frivolous Litigation Statute. We therefore demand that you withdraw your lawsuit within twenty-eight (28) days. Failure to do so within the twenty-eight (28) day period may expose you to court imposed sanctions.

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جواب بريد
يطلب من سحب القضية

Please be guided accordingly.

BAGOLIE FRIEDMAN LLC.



Thomas MacInnis, Esq.

هو ابعد من
بأنه آسب القصة